

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

John M. Breeden
3232 Sherwood Ridge Way
Powhatan, VA 23139
SSN: xxx-xx-6710

Debtor

Case No. **14-36523**
Chapter 13

MOTION TO SHORTEN NOTICE PERIOD
and EXPEDITE HEARING
Motion to Sell Real Property

COMES NOW the debtor, John M. Breeden by counsel and moves this Court pursuant to Local Rule 9013-1 (N) to set a hearing on the Debtor's Motion to Sell Real Property for a hearing as soon as practical and the Shorten the Notice period in this matter. In support of this Motion the debtor states as follows:

1. Debtor has filed a Motion to Sell Real Property.
2. Debtor contacted attorney with information necessary to file the Motion to Sell Real Property on June 5, 2015.
3. An emergency exists in that the debtor has received a ratified contract on the property.

WHEREFORE, Debtor requests that the Court shorten the notice period on the debtor's Motion to Sell Real Property and to set an Expedite hearing in this matter as soon as practical and for any and all other relief just and proper.

John M. Breeden

By /s/ Christopher M. Winslow

Certification

I Christopher M. Winslow certify that I am the attorney for the debtor and further that I have:

- (1) Carefully examined the matter and concluded that there is a true need for an emergency hearing,
- (2) Not created the emergency through any lack of due diligence, and
- (3) Have made a *bona fide* effort to resolve the matter without hearing. (There is no way to resolve this issue without an Order from the Court)

/s/ Christopher M. Winslow

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion to Shorten Notice Period and Motion for an Expedited hearing and the Notice of Motion was mailed by electronic means or by first class mail, this June 6, 2015 to the debtor, the Chapter 13 Trustee and all creditors and other parties of interest herein.

/s/ Christopher M. Winslow

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

John M. Breeden
3232 Sherwood Ridge Way
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SSN: xxx-xx-6710

Debtor

Case No. **14-36523**
Chapter 13

**NOTICE OF MOTION TO SHORTEN NOTICE PERIOD
and EXPEDITE HEARING**

Counsel for Debtor has filed papers with the court to Shorten the Notice Period on the debtor's Motion to Sell Real Property.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion then you or your attorney must file with the court, at the address shown below, a written request for a hearing or a written response pursuant to Local Bankruptcy Rule 9013-1 (H). If you mail your request for hearing or response to the court for filing, you must mail it early enough so the court will receive it at least two days prior to the hearing on the Motion to Sell Real Property that will be set by the Court in this matter at the United States Bankruptcy Court, 701 East Broad Street, Suite 310, Richmond, Virginia, Richmond, VA 23219.

You must also mail a copy to:

Christopher M. Winslow
Winslow & McCurry, PLLC
1324 Sycamore Square, Ste 202C
Midlothian, VA 23113

Chapter 13 Trustee
Carl M. Bates
P.O. Box 1819
Richmond, VA 23218-1819

NOTICE IS HEREBY GIVEN PURSUANT TO LOCAL RULE 9013-1, UNLESS A WRITTEN RESPONSE TO THIS MOTION AND SUPPORTING MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON THE MOVING PARTY NOT LESS THAN (TWO) 2 DAYS PRIOR TO THE HEARING SCHEDULED FOR JUNE 10, 2015 @ 12:00 P.M. ON THE MOTION TO SELL REAL PROPERTY, THE COURT MAY DEEM ANY OPPOSITION WAIVED AND ISSUE AN ORDER SUSTAINING THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

/s/ Christopher M. Winslow
Christopher M. Winslow

**United States Bankruptcy Court
Eastern District of Virginia
Richmond Division**

In re:

John M. Breeden
3232 Sherwood Ridge Way
Powhatan, VA 23139
SSN: xxx-xx-6710

Debtor

Case No. **14-36523**
Chapter 13

NOTICE of HEARING

PLEASE TAKE NOTICE that on **June 10, 2015 @ 12:00pm** or as soon thereafter as is practical, we will appear before the Honorable Kevin R. Huennekens in Room 5000 of the United States Bankruptcy Court, Eastern District of Virginia, Richmond Division located at 701 East Broad Street, Richmond, Virginia on **the Debtor's Motion to Sell Real Property.**

John M. Breeden

BY: /s/ Christopher M. Winslow
Counsel

CERTIFICATE

I hereby certify that on June 6, 2015, I mailed the foregoing document by electronic means or first class mail, postage pre-paid to:, U.S. Trustee, 701 E. Broad Street, Suite 4300, Richmond, VA 23219, the debtor(s), the Chapter 13 Trustee and all creditors and parties of interest herein.

/s/ Christopher M. Winslow
Christopher M. Winslow

Label Matrix for local noticing
0422-3
Case 14-36523-KRH
Eastern District of Virginia
Richmond
Sun Jun 7 22:18:29 EDT 2015

Ocwen Loan Servicing, LLC
McCabe, Weisberg & Conway, LLC
312 Marshall Avenue
Suite 800
Laurel, MD 20707-4808

United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219-1888

American Express Centurion Bank
c/o Becket and Lee LLP
POB 3001
Malvern PA 19355-0701

Amex
Po Box 297871
Fort Lauderdale, FL 33329-7871

Citi
Po Box 6241
Sioux Falls, SD 57117-6241

Commonwealth of VA-Tax
P.O. Box 2156
Richmond, VA 23218-2156

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Ocwen Loan Servicing L
12650 Ingenuity Dr
Orlando, FL 32826-2703

Ocwen Loan Servicing, LLC
Attn: Bankruptcy Department
P.O. BOX 24605
West Palm Beach, FL 33416-4605

Union Bank & Trust
PO Box 940
Ruther Glen, VA 22546-0940

Union1stmk
Po Box 446
Bowling Green, VA 22427-0446

Wells Fargo Bank
Po Box 14517
Des Moines, IA 50306-3517

Wells Fargo Card Services
1 Home Campus 3rd Floor
Des Moines, IA 50328-0001

Winslow & McCurry, PLLC
Christopher M. Winslow
1324 Sycamore Square
Midlothian, VA 23113-4668

eCAST Settlement Corporation assignee of Cit
NA
POB 29262
New York NY 10087-9262

Carl M. Bates
P. O. Box 1819
Richmond, VA 23218-1819

Christopher Mark Winslow
Winslow & McCurry, PLLC
1324 Sycamore Square, Suite 202C
Midlothian, VA 23113-4668

John M. Breeden
3232 Sherwood Ridge Way
Powhatan, VA 23139-4324

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Internal Revenue Service
Insolvency Unit
Post Office Box 21126
Philadelphia, PA 19114-0000

End of Label Matrix
Mailable recipients 18
Bypassed recipients 0
Total 18